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Attorneys for Defendant  
CITY AND COUNTY OF HONOLULU

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

THE ESTATE OF ERIC A.  
POWELL, THROUGH PERSONAL  
REPRESENTATIVE MARY K.  
POWELL; THE ESTATE OF JAMES  
D. LAUGHLIN, THROUGH  
PERSONAL REPRESENTATIVE  
REGINAE C. LAUGHLIN; MARY K.  
POWELL, INDIVIDUALLY;  
REGINAE C. LAUGHLIN,  
INDIVIDUALLY; CHLOE  
LAUGHLIN, A MINOR, THROUGH  
HER NEXT FRIEND, REGINAE C.  
LAUGHLIN,

Plaintiffs,

vs.

CITY AND COUNTY OF  
HONOLULU,

Defendants.

Civil No. CV04 00428 DAE-LEK

DEFENDANT CITY AND COUNTY  
OF HONOLULU'S RESPONSE TO  
PLAINTIFFS' SECOND REQUEST  
FOR ANSWERS TO  
INTERROGATORIES TO  
DEFENDANT CITY AND COUNTY  
OF HONOLULU DATED APRIL 4,  
2006; EXHIBITS "A-C"

l:/Powell/

EXHIBIT "37"

- (a) If so, please identify the document which would indicate those numbers and the person who has possession of them.

ANSWER:

Attendance Summary Report. Jacqueline Nerona, Cashiering Supervisor of Hanauma Bay.

2. What was the number of documented visitors to Hanauma Bay on July 19, 2002?

ANSWER:

DPR: 3,773

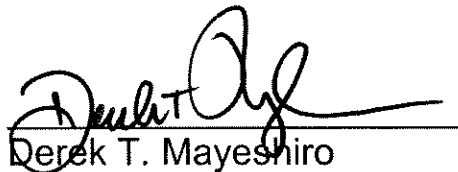
- (a) Where did you obtain this information?

ANSWER:

DPR: Attendance Summary Report.

3. Did anyone in the City and County Parks and Recreation Division receive any memos, letters or written requests for increased lifeguard staffing at Hanauma Bay from 2000-2003?

Objection. Vague and ambiguous. Request for information after the date of the incident is not reasonably calculated to lead to admissible evidence. Subsequent remedial measures.

  
Derek T. Mayeshiro

Without waiving said objections, DPR responds as follows:

DPR is not aware of receiving such documents.